

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

JOY SWEETING,)	
)	
Plaintiff,)	CIVIL ACTION NO. 04-0368 Erie
)	
v.)	Honorable Sean J. McLaughlin
)	
HIGHMARK, INC.,)	
)	
Defendant.)	

MOTION FOR EXTENSION OF TIME

COMES NOW, the Plaintiff, JOY SWEETING, by and through her attorneys, SCANLON & SANSONE and JOEL S. SANSONE, ESQUIRE, and files this Motion for Extension of Time to respond to Defendant's Motion for Summary Judgment for the following reasons:

1. Defendant filed a Motion for Summary Judgment on or about December 19, 2005.
2. Plaintiff's counsel has not yet received the transcripts for four depositions taken in this matter, including Volume II of the Plaintiff's deposition. Attempts were made to determine the status of the delivery of these transcripts, and Plaintiff's counsel was told that the court reporter who took those depositions is on vacation until Monday, January 9, 2006. Plaintiff's counsel was told that he could expect the completed transcripts to be delivered on or about Wednesday, January 11, 2006.
3. Therefore, Plaintiff respectfully requests that this Honorable Court grant an extension of two weeks for Plaintiff to file her response to Defendant's Motion for Summary Judgment in order to allow the court reporter to complete and deliver the transcripts in order to prepare the appropriate response to Defendant's Motion for Summary Judgment.

4. Defendant does not object to this request for an extension of two weeks.

WHEREFORE, for all the above reasons, the Plaintiff respectfully requests that this Honorable Court enter an Order granting a two-week extension in order for Plaintiff to file the appropriate summary judgment response. A proposed Order of Court is attached hereto.

Respectfully submitted,

s/Joel S. Sansone
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Dated: January 5, 2006